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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

SEP 29 1995

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the matter of )

Amendment of Part 95 of the )  
Commission's Rules to )  
Establish a very short distance )  
two-way voice radio service )

WT Docket No. 95-102

RM-8499

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**COMMENTS OF  
UNIDEN AMERICA CORPORATION**

**INTRODUCTION**

1. Uniden America Corporation (hereinafter "Uniden") respectfully submits its comments to the above captioned Notice of Proposed Rule Making ("NPRM"). These comments offer full support to the Commission's proposal to establish the Family Radio Service ("FRS") in the UHF band.

**BACKGROUND**

2. Uniden currently markets products designed to operate within the bands assigned to the General Mobile Radio Service ("GMRS") which utilize the same spectrum allocation proposed in the NPRM. Uniden also markets a broad line of commercial land mobile radio equipment, some of which operate in the

bands adjacent to the frequencies that are the subject of this proceeding. Additionally, Uniden markets a line of citizen band radios. Therefore, Uniden believes it is uniquely qualified to file comments supporting this NPRM as we did when we filed Reply Comments supporting the original Petition for Rule Making (RM-8499).

3. The Commission, as well as Tandy Corporation, should be applauded for their visionary concept of the anticipated FRS. Uniden agrees that this new communications medium will surely benefit many users in the future. An unlicensed service, such as the proposed FRS, will offer an alternative to the Citizens Radio Service. At the same time, it will reduce the illegal practice of operating devices intended for the licensed services by individuals who do not obtain the required station authorizations.

#### **DISCUSSION**

4. The Commission requested comment as to the proposed requirement for equipment authorization under the certification rules, as opposed to type acceptance or notification. Uniden supports the proposal that FRS devices be certified. Since this is the current practice for unlicensed services, Uniden sees no reason to change this procedure. Furthermore, the certification requirements

provide ample means to effectively police the technical integrity of equipment that will operate in this proposed service.

5. Uniden believes that FRS and GMRS are compatible. There will undoubtedly be those who conjure some scenario to demonstrate that there would be some increase in the potential for interference to GMRS by the proposed FRS. With the selection of frequencies, which are spectrally positioned between the main channels of the current GMRS, we agree with the Commission that "the technical standards for the FRS units should preclude any serious disruption to GMRS systems". The only direct co-channel concern is with units operating under the provisions of the current Part 95.29(f). Due to the low power and transient nature of the proposed FRS and the GMRS users operating on the interstitial channels, Uniden does not foresee any significant degree of problems associated with the shared usage between the two services.

6. The technical requirements of the proposed FRS basically mandate a small, hand-held transceiver capable of voice communications only. We agree that the power, bandwidth, and modulation type, as proposed in the NPRM, will sufficiently limit this service to a "range of approximately one kilometer". Therefore, Uniden supports the technical standards as proposed by the Commission.

7. The Commission further requested comment with regard to interconnection to the public switched network ("PSN"). Uniden is "on record" as proposing an interconnected licensed service in the GMRS band several years ago. However, with the number of communication paths available in the proposed FRS, and with the numbers of users in the geographical "spectrum re-use" area, there are just not enough channels available to offer interconnection with any sufficient degree of service quality. Also, interconnection would most likely disrupt the intended use for FRS by over utilizing the available channels. Therefore, we fully agree with the Commission's not allowing FRS devices to interconnect with the PSN.

8. The NPRM discussed selective calling. Uniden believes that the decision to incorporate selective calling, or not, should be left to the manufacturers. Additionally, with the various technologies available today, manufacturers have many choices for implementing the method and design of selective calling features. For this reason, we do not believe that the Commission should specify any interoperable selective calling standards in the proposed FRS. Uniden envisions that FRS units may be marketed in pairs of units, or possibly sold together in larger groups. Therefore, we believe that a possible feature would be the capability to communicate only within a certain defined group of units. On the other hand, there could be units marketed individually. In this case,

selective calling may, or may not, be a useful feature. Uniden believes that the restrictions mandated in the proposed Part 95.193(b) adequately address the concerns about selective calling within the scope of the proposed rules. If manufacturers want interoperable selective calling standards, then the industry trade associations offer technical forums to develop such standards.

#### CONCLUSION

9. Uniden reiterates its support for the proposed FRS. Uniden believes that it will serve many users by providing a low-cost communications medium for a variety of purposes. While any increase in spectrum activity could also increase the potential for interference to adjacent services, we strongly believe that the FRS will have no significant effect on the current GMRS, or to other services. We encourage the Commission to adopt the FRS as soon as possible.

Respectfully submitted,

September 28, 1995

A handwritten signature in cursive script, reading "James R. Haynes", is written over a horizontal dashed line.

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